

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ROBERT MORGAN,

Plaintiff,

v.

NOVARTIS PHARMACEUTICALS  
CORPORATION,

Defendant.

Civil Action No.: 1:08-cv-02343

**DEFENDANT'S DISCLOSURE  
STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, counsel for Defendant, Novartis Pharmaceuticals Corporation ("NPC"), hereby discloses and certifies that, to the best of my knowledge and belief, the following is a complete list of NPC's parent corporations and publicly held companies that own 10% or more of NPC's stock:

1. Parent Companies:
  - (a) Novartis Finance Corporation, a New York corporation;
  - (b) Novartis Corporation, a New York corporation;
  - (c) Novartis Holding, AG, a Swiss company; and
  - (d) Novartis AG, a Swiss company, whose American Depository Shares are publicly traded on the New York Stock Exchange.
2. Publicly held companies owning more than 10% of NPC stock:
  - (a) Novartis AG indirectly owns a 100% interest in NPC.

Dated: March 31, 2008

Respectfully submitted,

s/ Ethan D. Stein

Ethan D. Stein (ES-7130)

EStein@gibbonslaw.com

Diane E. Lifton (DL-9673)

GIBBONS P.C.

A Professional Corporation

One Pennsylvania Plaza, 37th Floor

New York, NY 10119-3701

Phone: 212-613-2000

Fax: 212-333-5980

*Counsel for Defendant Novartis*

*Pharmaceuticals Corporation*

*Of counsel:*

Joe G. Hollingsworth

Katharine R. Latimer

Robert E. Johnston

SPRIGGS & HOLLINGSWORTH

1350 I Street, NW, Ninth Floor

Washington, D.C. 20005

Phone: (202) 898-5800

Fax: (202) 682-1639

**CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2008, the Defendant's Disclosure Statement was filed with the Clerk of the Court and served in accordance with the Southern District's Rules on Electronic Service upon the following parties and participants:

Daniel A. Osborn, Esq.  
Russel H. Beatie, Esq.  
Philip J. Miller, Esq.  
Beatie and Osborn LLP  
521 Fifth Avenue, 34<sup>th</sup> Floor  
New York, NY 10175

I further certify that on March 31, 2008, I served a true and correct copy of the foregoing Defendant's Disclosure Statement by United States Mail, postage prepaid, on:

The Powell Law Firm, L.C.  
269 South Beverly Drive  
Suite 1156  
Beverly Hills, CA 90212

The Offices of Jeffrey C. Bogert  
501 Colorado Boulevard  
Suite 208  
Santa Monica, CA 90401

s/ Ethan D. Stein  
Ethan D. Stein